

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**BMG RIGHTS MANAGEMENT
(US) LLC, and ROUND HILL
MUSIC LP**

Plaintiffs,

v.

**COX ENTERPRISES, INC.,
COX COMMUNICATIONS, INC.,
COXCOM, LLC**

Defendants.

Case No. 1:14-cv-1611(LOG/JFA)

**BMG RIGHTS MANAGEMENT (US) LLC AND ROUND HILL MUSIC LP'S MOTION
TO FILE ELECTRONIC COPIES OF THEIR EXHIBITS TO THEIR
MOTION FOR SUMMARY JUDGMENT ON CD**

Plaintiffs BMG Rights Management (US) LLC and Round Hill Music LP (collectively "Copyright Holders") respectfully move this Court for an order to permit them to file the exhibits to their summary judgment motion on CD, rather than through the Court's Electronic Court Filing system (the "ECF").¹ In support, the Copyright Holders state as follows:

- 1) The Copyright Holders have asserted claims against Defendants for vicarious and contributory copyright infringement, involving over 1,400 copyrights.
- 2) The Copyright Holders intend to file a motion for summary judgment on September 21, 2015, that involves the majority of the copyrights at issue in the case.

¹ The Copyright Holders asked Cox its position on their motion, but did not receive a response by the time of filing.

3) As exhibits to their summary judgment motion, the Copyright Holders intend to include approximately 1,000 certified copyright registrations, in addition to approximately 200 other documents.

4) Because of the number of exhibits, it is more practical to file the exhibits with the Court on CD, rather than through the ECF.

For the reasons stated above, the Copyright Holders ask this Court for an order permitting them to file the exhibits to their summary judgment motion on CD. A proposed order is attached.

September 17, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2015, I electronically filed a true and correct copy of the foregoing using the Court's CM/ECF system, which then sent a notification of such filing (NEF) to all counsel of record:

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